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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KIMBERLY BEHZADI and JASON
RINDENAU, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

INTERNATIONAL CREATIVE
MANAGEMENT PARTNERS, LLC,

Defendant.

No: 14-cv-4382 (LGS)

**DECLARATION OF RACHEL BIEN IN SUPPORT OF MOTION FOR CONDITIONAL
CERTIFICATION AND COURT-AUTHORIZED NOTICE PURSUANT TO SECTION
216(b) OF THE FLSA AND IN OPPOSITION TO DEFENDANT'S MOTION TO
DISMISS AND COMPEL ARBITRATION**

I, Rachel Bien, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am a partner at Outten & Golden LLP, Plaintiffs' counsel herein. I am an attorney in good standing admitted to practice in the State of New York and before this Court.

2. I have been one of the lawyers primarily responsible for the prosecution of Plaintiffs' claims in this case.

3. I make the statements in this Declaration based on my personal knowledge and would so testify if called as a witness at trial.

Exhibits

4. Attached hereto as **Exhibit A** is a true and correct copy of the United States Department of Labor's Fact Sheet #71.
5. Attached hereto as **Exhibit B** is a true and correct copy of ICM's October 12, 2012 Offer Letter to Plaintiff Kimberly Behzadi.
6. Attached hereto as **Exhibit C** is Plaintiffs' proposed Collective Action Notice.
7. Attached hereto as **Exhibit D** is Plaintiffs' proposed Consent to Join Form.
8. Attached hereto as **Exhibit E** is a true and correct copy of an Order approving the plaintiffs' proposed court-ordered notice in *Scott v. Chipotle Mexican Grill, Inc.*, No. 12 Civ. 8333 (S.D.N.Y.).
9. Attached hereto as **Exhibit F** is a true and correct copy of relevant pages from the transcript of a November 1, 2013 court conference in *Glatt v. Fox Searchlight Pictures, Inc.*, No. 11 Civ. 6784 (S.D.N.Y.).

I swear under penalty of perjury that the foregoing is true and correct.

Dated: August 26, 2014
New York, New York

/s/ Rachel Bien

Rachel Bien

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